IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

PARADYME ASSET MANAGEMENT,	§	
LLC	§	
Plaintiff,	§	
	§	
	§	
V.	§	Civil Action No. 5:24-cv-00737-XR
	§	
	§	
FIGURD, LLC; PEGY BRIMHALL	§	
DAVID ROBERTSON; and	§	
ROBERTSON ARCHITECTURE, LLC	§	
	§	
Defendants.	§	

JOINT ADVISORY TO THE COURT REGARDING MEDIATION

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

NOW COME Plaintiff/Counter-Defendant, PARADYME ASSET MANAGEMENT, LLC, Defendant/Counter-Plaintiff, FIGURD, LLC, a Texas limited liability company, Defendant, PEGY BRIMHALL, Defendant, DAVID ROBERTSON, and Defendant, ROBERTSON ARCHITECTURE, LLC and, pursuant to the First Amended Scheduling Order [Doc. 31] and Rule 88, the parties hereby advise the Court as follows:

- 1. All the parties to this proceeding and their respective counsel participated in an all-day Zoom mediation with mediator, Donald R. Philbin, Jr., on December 13, 2024.
 - 2. The parties were unable to reach a settlement at mediation.
- 3. The parties intend to move forward with the litigation and continue discovery in accordance with the First Amended Scheduling Order [Doc. 31].

Date: January 6, 2025 Respectfully submitted,

CARLTON FIELDS, P.A.

700 N.W. 1ST. Avenue, Suite 1200 Miami, FL 33136 Telephone No.: (305) 530-0050

/s/James Czodli

AARON S. WEISS
Florida Bar No. 48813

aweiss@carltonfields.com

LEE STAPLETON
Florida Bar No. 356778
(Admitted Pro-Hac Vice)
Lstapleton@carltonfields.com

AARON S. WEISS
Florida Bar No. 48813

aweiss@carltonfields.com

JAMES CZODLI
Florida Bar No. 123523

jczodli@carltonfields.com

Florida Bar No. 123523

ATTORNEYS FOR PLAINTIFF/COUNTER-DEFENDANT, PARADYME ASSET MANAGEMENT, INC.

DAVIS, CEDILLO & MENDOZA, INC.

McCombs Plaza, Suite 250 755 E. Mulberry Avenue San Antonio, Texas 78212 Telephone No.: (210) 822-6666 Telecopier No.: (210) 660-3795

/s/Brandy C. Peery

RICARDO G. CEDILLO Texas Bar No. 04043600 rcedillo@lawdcm.com BRANDY C. PEERY Texas Bar No. 24057666 bpeery@lawdcm.com

ATTORNEYS FOR DEFENDANT/COUNTER-PLAINTIFF, FIGURD, LLC, AND DEFENDANT, PEGY BRIMHALL

BENJAMIN, VANA, MARTINEZ & CANO, L.L.P.

2161 NW Military Highway, Suite 111 San Antonio, Texas 78213 Telephone No.: (210) 881-0667 Telecopier No.: (210) 881-0688

/s/Jana Richard

DAVID P. BENJAMIN (Attorney-in-Charge) Texas Bar No. 02134375 dbenjamin@benlawsa.com JANA RICHARD State Bar No. 24040752 jrichard@benlawsa.com

ATTORNEYS FOR DEFENDANTS, DAVID ROBERTSON AND ROBERTSON ARCHITECTURE, LLC

CERTIFICATE OF SERVICE

I certify that on the 6th day of January 2025 a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/Brandy C. Peery

BRANDY C. PEERY